

ORIGINAL

(Pm  
6/20

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SHIN-EI BOEKI, LTD.,  
Plaintiff

v.

SCOTT KAJIYA, MICHAEL W.  
BINGHAM, CARY BRIGGS,  
SIGN LANGUAGE EYEWEAR, INC.  
d/b/a HABITAT,  
and SI SCOOTER WORKS, INC.,  
Defendants

CIVIL ACTION

No. 1: CV - 00- 2241

(Judge Kane)

FILED  
HARRISBURG, PA

JUN 19 2002

MARY E. D'ANDREA, CLERK  
Per \_\_\_\_\_ Esquire

**DEFENDANT SCOTT KAJIYA'S ANSWER TO THE AMENDED COMPLAINT**

AND NOW, this 19<sup>th</sup> day of June, 2002 comes Defendant Scott Kajiya, by and through its undersigned attorney, Michael J. Hanft, Esquire of Hanft and Knight, P.C., hereby files the following Answer to the Amended Complaint and, in support thereof, avers as follows:

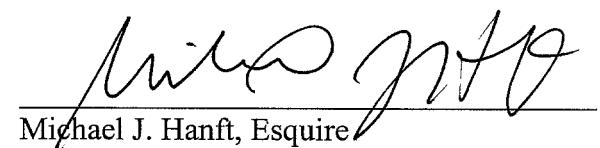
1. Denied as stated.
2. Admitted.
3. Admitted in part, denied in part. Mr. Kajiya's address is 1872 Del Amo Blvd., Unit B, Torrence, CA 90501.

4. Admitted.
5. Admitted.
6. Admitted in part, denied in part. Sign Language Eyewear, Inc. has ceased doing business.
7. Admitted.
8. Admitted.
9. Admitted.
10. Denied. It is specifically denied that Defendant Kajiya executed Exhibit "A" to the Amended Complaint.
11. Denied.
12. Denied.
13. Denied.
14. Denied.
15. Denied.
16. The answers to Paragraphs 1 through 15 above are incorporated by reference as if fully set forth herein.
17. Denied.
18. Denied.
19. Admitted in part, denied in part. It is admitted Exhibit "B" was sent. It is denied that Defendant Kajiya owes or owed any monies to Plaintiff.
20. Denied.
21. Denied.

WHEREFORE, Defendant Scott Kajiya requests this Honorable Court find in favor or  
Defendant Scott Kajiya and against Plaintiff with regard to Plaintiff's Amended Complaint.

Respectfully Submitted,

HANFT & KNIGHT, P.C.



Michael J. Hanft, Esquire  
Attorney I.D. No. 57976  
19 Brookwood Avenue, Suite 106  
Carlisle, Pennsylvania 17013-9142  
(717) 249-5373

Attorneys for Defendant Scott Kajiya

**CERTIFICATE OF SERVICE**

AND NOW, this 19th day of June, 2002, I, Michael J. Hanft, Esquire, hereby certify that I have this day served the following persons with a copy of the foregoing document, by first class, United States Mail, postage pre-paid, addressed as follows:

Jonathan S. Ziss, Esquire  
SILVERMAN, BERNHEIM & VOGEL  
Two Penn Center Plaza, Suite 910  
Philadelphia, Pennsylvania 19102  
Attorney for Plaintiff, Shin-Ei Boeki, Ltd.

HANFT & KNIGHT, P.C.

  
Michael J. Hanft, Esquire  
Attorney I.D. No. 57976  
19 Brookwood Avenue, Suite 106  
Carlisle, Pennsylvania 17013-9142  
(717) 249-5373

Attorneys for Defendant Scott Kajiya